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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN VEGA-RAMOS,

Defendant.

No. CR 05-00362 WHA

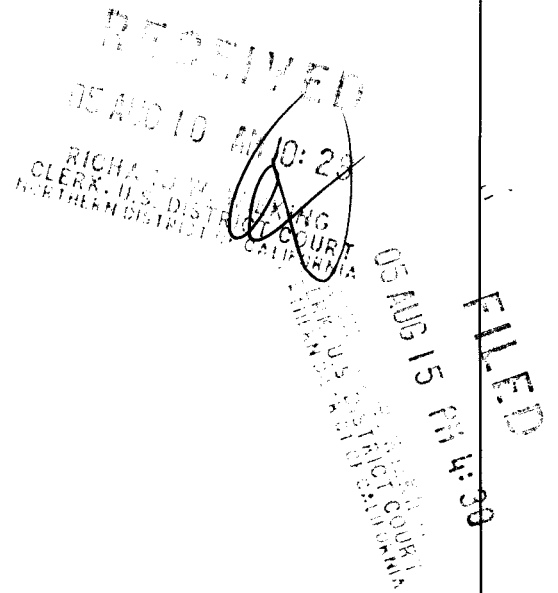
[PROPOSED] ORDER AND  
STIPULATION CONTINUING MOTIONS  
HEARING DATE FROM SEPTEMBER 6,  
2005 TO SEPTEMBER 13, 2005

On July 26, 2005 defendant filed a Motion to Dismiss the Indictment and Motion to Suppress Statements. Opposition by the Government is due on August 9, 2005 and the hearing is set for September 6, 2005.

This case was recently assigned to Assistant United States Attorney William I. Shockley, who, shortly thereafter was out of the office for scheduled annual leave from July 29, 2005 to August 8, 2005. Since returning to the office on August 8, AUSA Shockley has been on duty for the United States Attorney's Office, and has been actively preparing for trial before Judge Patel in United States v. Barry Nufeld, CR 05-00245 MHP, and meeting deadlines in other cases.

Accordingly, the government sought defendant's stipulation for extension of time and

MOTION FOR EXTENSION OF TIME  
AND PROPOSED ORDER  
CR 05-00362 WHA




1 respectfully requests this court grant the extension based upon this stipulation and the reasons set  
2 forth herein.

3 The parties hereby stipulate and agree that the government's responses may be filed on or  
4 before August 23, 2005; the defendant's reply may be filed on or before August 30, 2005, and the  
5 hearing shall be held on September 13, 2005 at 2:00 P.M.

6 SO STIPULATED

7  
8 DATED: Aug 9, 2005

  
WILLIAM I. SHOCKLEY  
Assistant United States Attorney  
Stip1 ext vega

9  
10  
11 DATED: Aug 10, 2005

  
JOSH COHEN  
Assistant Federal Public Defender

12  
13  
14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15  
16 DATED: 8-15-05

  
WILLIAM ALSOP  
United States District Judge

UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

USA et al,

Plaintiff,

v.

Vega-Ramos et al,

Defendant.

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Case Number: CR05-00362 WHA

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District Court, Northern District of California.

That on August 15, 2005, I SERVED a true and correct copy(ies) of the attached, by placing said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office delivery receptacle located in the Clerk's office.

William Shockley  
Office of the U.S. Attorney  
450 Golden Gate Ave.  
San Francisco, CA 94102

Josh Alan Cohen  
Office of the Public Defender  
450 Golden Gate Avenue  
19<sup>th</sup> floor  
San Francisco, CA 94102

Dated: August 15, 2005

Richard W. Wieking, Clerk  
By: D. Toland, Deputy Clerk

